

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§ Chapter 11
	§
TMT PROCUREMENT CORPORATION, <i>et al.</i> , ¹	§ Case No.: 13-33763
	§
Debtors.	§ (Jointly Administered)

**WITNESS AND EXHIBIT LIST OF SHANGHAI COMMERCIAL AND SAVINGS
BANK LTD., FOR AUGUST 28, 2013, HEARING**

Shanghai Commercial and Savings Bank Ltd., both in its capacity as an individual lender as well as its role as agent bank in those certain syndicated facilities related to certain of the above-captioned debtors and debtors in possession (“**Shanghai Bank**”), through its undersigned counsel, hereby submits this *Witness and Exhibit List* for all matters scheduled to be heard on **Wednesday, August 28, 2013** (the “**Hearing**”).

WITNESSES

Shanghai Bank may call any of the following witnesses at the Hearing, whether in person, telephonically, or by proffer:

- Jim Dolphin of AMA Capital Partners LLC;
- Hsin-Chi Su;
- TMT corporate representative;
- Bracewell representative

¹ The Debtors in these Chapter 11 cases (the “**Cases**”) are: (1) A Whale Corporation; (2) B Whale Corporation; (3) C Whale Corporation; (4) D Whale Corporation; (5) E Whale Corporation; (6) G Whale Corporation; (7) H Whale Corporation; (8) A Duckling Corporation; (9) F Elephant Inc.; (10) A Ladybug Corporation; (11) C Ladybug Corporation; (12) D Ladybug Corporation; (13) A Handy Corporation; (14) B Handy Corporation; (15) C Handy Corporation; (16) B Max Corporation; (17) New Flagship Investment Co., Ltd.; (18) RoRo Line Corporation; (19) Ugly Duckling Holding Corporation; (20) Great Elephant Corporation; and (21) TMT Procurement Corporation.

- Lisa Donahue;
- AlixPartners witness;
- any witness called by any other party; and
- any witness necessary for rebuttal.

EXHIBITS

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Bracewell Engagement Letter				
2	Bracewell Declaration in support of retention application				
3	Amended Bracewell Declaration in support of retention application				
4	Any other exhibit offered for admission by any other party at the Hearing.				

Shanghai Bank reserves the right to ask the Court to take judicial notice of pleadings and transcripts and/or documents and to supplement or amend this *Witness and Exhibit List* at any time prior to the Hearing.

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Respectfully submitted this 26th day of August, 2013,

Dated: August 26, 2013

Respectfully submitted,

GARDERE WYNNE SEWELL LLP

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*Attorneys for Shanghai Commercial &
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Certificate of Service

I hereby certify that on August 26, 2013, this document was served through the court's ECF system on all parties entitled to receive electronic notice in these cases, including counsel for the Debtors, the Official Committee of Unsecured Creditors, the U.S. Trustee, and all parties who have filed a notice of appearance requesting such service, as indicated below:

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/s/ John P. Melko
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